

PHILIP C. HUNSUCKER (SBN 135860)  
BRIAN L. ZAGON (SBN 142403)  
MARC SHAPP (SBN 266805)  
HUNSUCKER GOODSTEIN PC  
3717 Mt. Diablo Blvd., Suite 200  
Lafayette, CA 94549  
Telephone: (925) 284-0840  
Facsimile: (925) 284-0870

LEE N. SMITH (SBN 138071)  
PERKINS, MANN & EVERETT, APC  
7815 N. Palm Ave, Suite 200  
Fresno, CA 93711  
Telephone: (559) 447-5700  
Facsimile: (559) 447-5600

Attorneys for Plaintiff  
AMERIPRIDE SERVICES INC.

FRED M. BLUM (SBN 101586)  
ERIN K. POPPLER (SBN 267724)  
VIVY D. DANG (SBN 297714)  
BASSI, EDLIN, HUIE & BLUM LLP  
500 Washington Street, Suite 700  
San Francisco, CA 94111  
Telephone: (415) 397-9006  
Facsimile: (415) 397-1339

Attorneys for Defendant  
TEXAS EASTERN OVERSEAS, INC.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

AMERIPRIDE SERVICES INC., a  
Delaware corporation,

Plaintiff,

vs.

VALLEY INDUSTRIAL SERVICES, INC.,  
a former California Corporation, et al.

Defendants.

Case No. 2:00-cv-00113-MCE-DB

**STIPULATION AND ORDER RE  
ADMISSION OF VIDEO DEPOSITION  
EXCERPTS PRESENTED AT TRIAL**

Trial Date: October 17-19, 2016  
Time: 9:00 a.m.  
Courtroom: 7  
Judge: Hon. Morrison C. England, Jr.

Complaint Filed: January 20, 2000

AND CONSOLIDATED ACTION AND  
CROSS AND COUNTER-CLAIMS.

Plaintiff AMERIPRIDE SERVICES INC. ("AmeriPride") and Defendant TEXAS EASTERN OVERSEAS, INC. ("TEO"), by and through their respective counsel, stipulate as follows with respect to the admission of deposition testimony of Gary Hokkanen shown by video at trial:

### RECITALS

1. On October 17 through October 19, 2016, the Court held a bench trial in this matter (the "Trial");
2. During the course of the Trial, AmeriPride presented two excerpts of the video deposition of TEO's expert, Gary Hokkanen, designated "clip H70" and "clip 37";
3. At the time the first deposition excerpt was presented during the Trial, and at the request of the Court, AmeriPride and TEO agreed to stipulate to the submission of such deposition clips in lieu of them being transcribed by the court reporter.

### STIPULATION

Based on the foregoing, AmeriPride and TEO, through their respective counsel of record, stipulate as follows:

1. The portion of the deposition transcript of the deposition of Gary Hokkanen that corresponds to clip H70 presented during the Trial is set forth in the attached **Exhibit A**;
2. The portion of the deposition transcript of the deposition of Gary Hokkanen that corresponds to clip 37 presented during the Trial is included in the attached **Exhibit B**;
3. AmeriPride and TEO jointly request that the Court receive into evidence the deposition testimony included in **Exhibit A** and **Exhibit B**.

Date: November 2, 2016

BASSI, EDLIN, HUIE & BLUM LLP

By: /s/ Fred M. Blum  
FRED M. BLUM  
ERIN K. POPPLER  
Attorneys for Defendant  
TEXAS EASTERN OVERSEAS, INC.

1 Date: November 2, 2016

HUNSUCKER GOODSTEIN PC

2  
3 By: /s/ Brian L. Zagon  
4 PHILIP C. HUNSUCKER  
5 BRIAN L. ZAGON  
6 MARC A. SHAPP  
7 Attorneys for Plaintiffs  
8 AMERIPRIDE SERVICES INC.

9 Date: November 2, 2016

PERKINS MANN & EVERETT, APC

10 By: /s/ Lee N. Smith  
11 LEE N. SMITH  
12 Attorneys for Plaintiffs  
13 AMERIPRIDE SERVICES INC.

14 **ORDER**

15 Based on the parties' stipulation, the Court hereby receives into evidence the  
16 deposition testimony included in Exhibits A and B attached to the above stipulation, filed  
17 with the Court at ECF No. 1122.

18 IT IS SO ORDERED.

19 Dated: November 10, 2016

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21 MORRISON C. ENGLAND, JR.  
22 UNITED STATES DISTRICT JUDGE  
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